U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: ________________
DATE FILED: October 31, 2016

October 31, 2016

MEMO ENDORSED

BY ECF
The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Any and All Funds On Deposit in Account No. 0139874788 et al., 13 Civ. 7983 (KPF)

Dear Judge Failla:

We write on behalf of the parties to provide the Court with a joint proposed briefing schedule for motions in limine in this case:

Motions in Limine Due by: January 6, 2017
Oppositions to Motions in Limine Due by: January 20, 2017
Replies in Support of Motions in Limine Due by: January 27, 2017

The parties intend to complete any agreed-upon additional discovery by January 6, 2017. In response to the issues discussed at the last conference in this matter, Claimants have offered to re-open the deposition of Erxin Zhou and to arrange for the deposition of Randy Fishman, who is one of the two attorneys referenced on pp. 22-23 of the Court's August 29, 2016 Opinion and Order.

Respectfully submitted,

PREET BHARARA
United States Attorney for the
Southern District of New York

By: /s/
Sarah E. Paul/Edward B. Diskant
Assistant United States Attorneys
(212) 637-2326/2294

cc: Bruce Baird, Esq.
Benjamin Razi, Esq.
(Counsel for Claimants Unicorn Tire Corporation and Efans Trading Corporation)

Application GRANTED; the parties may proceed according to the briefing schedule proposed herein. The parties are further directed to appear for a Final Pretrial Conference on Tuesday, February 7, 2016 at 3:00 PM, in Room 618 of the Thurgood Marshall Courthouse.

SO ORDERED.

Katherine Polk Failla

Dated: October 31, 2016
New York, New York

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE